

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re: WC SOUTH CONGRESS SQUARE, LLC, Debtor.	§ § § § §	Case No. 20-11107-tmd Chapter 11
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DEBTOR'S WITNESS AND EXHIBIT LIST

COMES NOW WC South Congress Square LLC (the “**Debtor**”) and offers the below list of witnesses and exhibits for the hearing on the confirmation of the *Debtor's Second Amended Chapter 11 Plan of Reorganization* [Doc 79], and any amendments thereto scheduled for April 15, 2021 at 1:30 p.m. C.T.

WITNESS LIST¹

1. Natin Paul (by sworn proffer);
2. Jeffrey Worley (by sworn proffer);
3. Stephanie Dubicki Hansz (by sworn proffer);
4. All witnesses listed or called by any other;
5. Any witness with knowledge of facts rebutting the testimony of any witness called by any other party.

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted
1.	Sworn proffer of Natin Paul			
2.	Sworn proffer of Jeffrey Worley			

¹ The Debtor reserves all rights to supplement proffered sworn testimony, including (but not limited to) rebuttal testimony.

Ex. #	Description	Offered	Objection	Admitted / Not Admitted
3.	Sworn proffer of Stephanie Dubicki, with Ankura Appraisal Report (Ex. A)			
4.	Debtor's Second Amended Plan of Reorganization [Docket No. 79]			
5.	Debtor's Second Amended Disclosure Statement (with Exhibits) [Docket No. 80].			
6.	Certificate of Service [Docket No. 86]			
	Any Exhibit Listed or Offered by any Other Party			
	Any Rebuttal Exhibit			

Additionally, the Debtor requests that this Court take judicial notice of any and all filings made and orders entered in this Bankruptcy Case.

Dated: the 10th day of April, 2021.

Respectfully submitted,

FISHMAN JACKSON RONQUILLO PLLC

/s/ Mark H. Ralston

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COUNSEL FOR DEBTOR
WC SOUTH CONGRESS SQUARE LLC

CERTIFICATE OF SERVICE

This is to certify that the undersigned caused a true and correct copy of the foregoing document to be served on all persons receiving electronic notice of filings in this case through the ECF system, and by email on the persons listed below, on this, the 10th day of April, 2021.

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/s/ Mark H. Ralston
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